The following is a public comment on FCC deregulation of Amateur radio proceeding 25-133.

1) FCC should consider re-defining phone and digital signals as recent technological developments have allowed data transmissions to contain phone signals as well as data signals such as FreeDV, DMR, etc. The amateur radio operator who is not a legal expert should have no confusion in determining the legal status of their radio transmission type.

2) 97.119(a) The requirement to identify a minimum of once every 10 minutes during a communication should be raised, and the operator should be given an additional period until the channel is clear to identify themselves. Conversations are unpredictable by nature, an operator complying with the 10-minute rule may be forced to transmit on top of another operator when their 10-minute time is up, resulting in neither transmission being intelligible. This clearly goes against the intent of identifying the station.

3) 97.205(h) As the Arecibo Observatory is no longer functional, this section should be removed

4) 97.215(c) Transmitter power should be allowed to exceed 1 watt in small portions of some bands assigned by FCC to better facilitate amateurs in long-range telecommand missions.

5) 97.133(a)(4) The language “messages encoded for the purpose of obscuring their meaning” should be clarified. In many niche cases, an operator might have a legitimate purpose for encrypting data transmission. Particularly in the 12cm band where an operator’s primary method of transmission is over the 802.11 Wi-Fi standard, using the Hyper Text Transfer Protocol Secure. While it is important to keep the Amateur radio frequencies free of private, encrypted communications outside of the purpose of Amateur radio, modern packet radio is heavily inhibited by these restrictions. FCC should consider the needs of modern packet radio, and place regulations regarding it in their own subpart where the amateur radio operator can easily determine they are transmitting legally.